## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE: DEALER MANAGEMENT SYSTEMS ANTITRUST LITIGATION

MDL No. 2817 Case No. 18 C 864

Hon. Robert M. Dow, Jr.

This Document Relates to:

Loop, LLC, d/b/a AutoLoop v. CDK Global,

LLC, Case No. 18 C 2521 (N.D. Ill.)

Jury Trial Demanded

## PLAINTIFF AUTOLOOP'S MOTION TO SEAL ITS AMENDED COMPLAINT - CLASS ACTION

Plaintiff Loop, LLC ("AutoLoop") respectfully requests leave to file under seal its Amended Complaint – Class Action, and Accompanying Exhibits. The Amended Complaint and Exhibits include information from documents that CDK Global, LLC ("CDK") has designated as "Highly Confidential," and so AutoLoop seeks leave to file them under seal. AutoLoop will also file a public, redacted version of the Amended Complaint – Class Action.

AutoLoop files this motion without prejudice to its ability to file a motion challenging CDK's designations. The documents at issue consist of direct communications between CDK and Reynolds reflecting the unlawful agreements alleged in AutoLoop's Amended Complaint, and internal CDK documents regarding the same. There is nothing Highly Confidential about such communications and documents, yet CDK has thus far refused to de-designate them. Should the parties be unable to resolve their disagreement, AutoLoop reserves the right to move for relief from this Court.

June 5, 2018

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Counsel for Plaintiff Loop, LLC, d/b/a AutoLoop

## **CERTIFICATE OF SERVICE**

I, Derek T. Ho, an attorney, hereby certify that on June 5, 2018, I caused a true and correct copy of the foregoing AUTOLOOP'S MOTION TO SEAL ITS AMENDED COMPLAINT – CLASS ACTION, AND ACCOMPANYING EXHIBITS to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by email to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Der<u>ek T. Ho</u>

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